

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

UNITED STATES OF AMERICA,	)	CASE NO. 1:12-CR-238
	)	
Plaintiff,	)	JUDGE PATRICIA GAUGHAN
	)	
vs.	)	
	)	
	)	
ANTHONY HAYNE,	)	<b><u>MOTION FOR EXTENSION OF</u></b>
	)	<b><u>TO FILE BRIEF ON ISSUE</u></b>
	)	<b><u>OF SUPERVISED RELEASE</u></b>
Defendant	)	
	)	
	)	

Now comes Defendant Anthony Hayne (the "Defendant"), by and through counsel, and hereby respectfully moves this Court for an extension of time to file a brief regarding the lifetime supervised release.

The undersigned is in conversation with the Probation Department and the United State's Attorney's Office regarding the law as it relates to the current lifetime supervised release issue. There may (or may not) be consensus on the law on this issue. The undersigned reasonably believes that both the United State's Attorney's Office and the Probation Department may need some time to consider the Defendant's legal position on the issue (that position was recently communicated to the United State's Attorney's Office and the Probation Department in writing).

This Court currently has a supervised release hearing set in

this matter for January 21, 2020. In that regard, there is sufficient time for the undersigned, the Probation Department and the United State's Attorney's Office to have further discussions on the issue.

It is the understanding of the undersigned that the United States Attorney's Office has no objection to this motion.

For the foregoing reasons, the Defendant so moves this Court.

Respectfully submitted;

LIPSON O'SHEA LEGAL GROUP

/Michael J. O'Shea

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**Attorney for the Defendant**

### **PROOF OF SERVICE**

I hereby certify that a true copy of the foregoing has been filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic record. All other parties will be served by regular U.S. Mail. Parties may access this filing through the Court's electronic system.

S/Michael J. O'Shea

Michael J. O'Shea